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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JAMES LEONARD WATERS, JR.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 2:21-cv-01719-CDS-EJY

**Stipulation and Order**

**(Second Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request an approximately 90-day extension of certain discovery deadlines as, and for the reasons, set forth below. This stipulation, which is filed more than 21 days before the earliest deadline to be extended (for initial expert disclosures), is supported by grounds and circumstances below. This is the second request for an extension of the discovery schedule, although the original scheduled provided some additional time, as discovery commenced from the filing of the discovery plan rather than Defendant's first appearance.

**DISCOVERY COMPLETED**

The parties have completed the following disclosures and discovery:

1. The parties served their initial disclosures in March and April 2022.
2. Defendant served a first set of Requests for Production and Interrogatories on Plaintiff on March 30, 2022.

5. Defendant has noticed several depositions of Defendant's employees for dates in September 2022.

## DISCOVERY REMAINING

Defendant will respond to Plaintiff's first set of written discovery requests.

Initial and rebuttal expert disclosures remain.

## WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

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**EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

The following table sets forth the current deadlines and the proposed extended deadlines that are the subject of this stipulated request for extension:

SCHEDULED EVENT	CURRENT DEADLINE	<del>PROPOSED</del> DEADLINE
Initial Expert Disclosures	September 1, 2022	December 1, 2022
Rebuttal Expert Disclosure	October 3, 2022	January 4, 2023
Discovery Cut Off	November 1, 2022	February 2, 2023
Dispositive Motions	November 30, 2022	March 3, 2023
Joint Pretrial Order	December 30, 2022	April 3, 2023 <sup>1</sup>

Respectfully submitted this 4th day of August 2022.

<b>LAIRD LAW PLLC</b>  <u>/s/ Danial Laird</u> <b>DANIAL LAIRD, ESQ.</b> Nevada Bar No. 11831 8991 West Flamingo Road, Suite C Las Vegas, NV 89147 <i>Attorney for Plaintiff</i>	<b>JASON M. FRIERSON</b> United States Attorney  <u>/s/ Patrick A. Rose</u> <b>PATRICK ROSE</b> Assistant United States Attorney <i>Attorneys for the United States</i>
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**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** August 4, 2022

<sup>1</sup> However, if dispositive motions are filed, the proposed joint pretrial order will be due thirty days after the rulings on such dispositive motions.